

Department of Energy

Ohio Field Office Fernald Area Office

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DOE-0577-00

APR 1 8 2000

Mr. Paul Pardi, RCRA Group Leader and FFCA Project Manager Ohio Environmental Protection Agency Division of Hazardous Waste Management 401 East 5th Street Dayton, Ohio 45402-2911

Dear Mr. Pardi:

SUBMITTAL OF CROSS-REFERENCE INDEX PURSUANT TO THE DIRECTOR'S FINAL FINDINGS AND ORDERS FILED JUNE 6, 1996

Reference:

Letter and Director's Final Findings and Orders, Thomas E. Crepeau, OEPA to Phil Hamric, U. S. DOE and John Bradburne, Fluor Fernald, dated June 6, 1996.

In accordance with Section V, Order #2 of the referenced Director's Final Findings and Orders (DF&O), enclosed is a cross-reference index of Hazardous Waste Management Unit (HWMU) closure components and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documents for those HWMUs identified in Attachment A of the DF&O. The index links specific components of Ohio Environmental Protection Agency's (OEPA) Closure Plan Review Guidance for Resource Conservation and Recovery Act (RCRA) Facilities related to substantive closure requirements with the appropriate CERCLA document which addresses those components. The list is cumulative and provides page numbers and sections for those CERCLA documents that have already been submitted.

The submittal of this cross-reference index meets the requirement in Section V to provide this document following the submittal of a CERCLA document identified in the cross-reference index. The Draft Implementation Plan for Area 3A/4A was submitted to the OEPA and U.S. Environmental Protection Agency (U.S. EPA) on March 30, 2000. The specific references to this document in the cross-reference table have been highlighted.

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Mr. Paul Pardi

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APR 1 8 2000

If you have any questions regarding this matter, please contact Shannon Kaster at (513) 648-3157.

Sincerely,

Johnny W. Reising

Fernald Remedial Action

Project Manager

FEMP:Kaster

Enclosure

cc w/enclosure

S. Kaster, OH-FEMP

R. V. Holmes, Fluor Fernald/3

M. A. Jewett, Fluor Fernald/52-2

T. A. Poff, Fluor Fernald/65-2

AR Coordinator, Fluor Fernald/78

cc w/o enclosure:

A. Tanner, OH/FEMP

| Description/Detailed Drawing of Waste Management Unit(s) to be Closed (Closure Guidance Item 3.2 and 3.4) | OU1 FINAL Remedial Investigation Report, August1994 | Waste Pit 4 (27): Description, pp. 1-23 to 1-24; History, pp. 1-35 to 1-36; Drawings, pp. 1-83, |
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| | OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997 | HWMU Component Number and Associated D&D complex: Table 3-10, p. 3-71 D&D Complex Locations: Figure 2-2, p. 2-17 |
| | OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement | Drawing of HWMU: To be submitted for Each D&D Complex |
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| | FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997 | Plant 9 Warehouse - Bldg. 81 (35): Figure D-10, D-11 |
| | FINAL Misc. Small Structures Implementation Plan, October 1998 | Waste Oil Decant Shelter (component of Trane Incinerator) (28): No drawing available for this unit |
| 000003 | | KC-2 Warehouse – Bldg. 63 (34): Figure D-22, D-23 |
| | | UNH Tanks – NFS Storage Area (46): Figure D-1 |
| | FINAL Implementation Document for HWMUs #28 and #50 , December 1998 | Trane Incinerator (28): Attachment 1 |
| | | UNH Tanks – Raffinate Bldg. (50): Attachment 2 |
| | FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999 | Plant 6 Warehouse – Bldg. 79 (37): Appendix D |
| | OU5 FINAL Remedial Investigation Report, March 1995 | General Location Map of HWMUs to be Closed Under CERCLA: Figure 4-112 Size and Dimensions of HWMUs: Table 1-12 FEMP Topographic Map: Figure 3-1 |
| | | General HWMU Information and Locations Within OU5 Areas, Appendix D: Plant 1 Storage Pad (20): Plant 1 Area, Section D.2.1, p. D.2-2 |
| | | UNH Tanks (46-50), NAR System (10), Trane Incinerator (28): Plant 2/3 Area, Section D.2.2, p. D.2-19 |

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| 2. List of Hazardous Waste(s) Managed in Unit(s) (Closure Guidance Item 3.5) | OU1 FINAL Remedial Investigation Report, August 1994 OU3 FINAL Remedial Investigation/Feasibility Study Report OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement | Waste Managed in Unit: Waste Pit 4 (27): pp. 4-60 to 4-70, pp. 1-35 to 1-36 Waste Pit 5 (42): pp. 4-70 to 4-77, pp. 1-36 to 1-37 Waste Managed in HWMU: Table K-1 Waste Managed in HWMU: To be Submitted for Each D&D Complex |
| | FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996 FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997 FINAL Misc. Small Structures Implementation Plan, October 1998 | Plant 1 Storage Bldg. – Bldg. 67 (25): Section 3.7, p. 42 Plant 9 Warehouse – Bldg. 81 (35) Section 3.13, pp. 39 to 40 Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, p. 36 |
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| | DRAFT Implementation Plan for Area 3A/4A, March 2000 | Storage Pad North of Plant 6 (36): Section 2.3.2.3, Location of HWMUs and USTs, p. 2-11 |
| Removal of Waste and Contaminated Media (Closure Guidance Item 3.6) | OU1 FINAL Remedial Design Documents Package, August 1998 | Removal of Waste – Waste Pit 4 (27), Waste Pit 5 (42): Volume 2, Excavation Plan |
| | OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan May 1997 | General Methods for Removing and Storing Waste: HWMU Decontamination, Section 3.2.3, p. 3-13; Materials Management, Section 3.3, pp. 3-30 to 3-63; HWMU Remediation (use of Safe Shutdown, D&D of complexes), Section 3.5.3, pp. 3-69 to 3-73 |
| · | OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement | Removing Waste from HWMU Storage, Treatment, and Disposition of Waste: To be Submitted for Each D&D Complex |
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| | FINAL Misc. Small Structures Implementation Plan, October 1998 | Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, pp. 36 to 37 |
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| | FINAL Implementation Document for HWMUs #28 and #50, December 1998 | Trane Incinerator (28): Remedial Tasks |
| | | UNH Tanks - Raffinate Bldg. (50): Remedial Tasks, HWMU Decontamination |
| | FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999 | Plant 6 Warehouse - Bldg. 79 (37): Section 3.9, p. 37 |
| | OU5 FINAL Sitewide Excavation Plan, July 1998 | Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F.3 to F.5, Implementation of Construction; Appendix I, Sitewide Excavation of Contamination by Constituent |
| · | OU5 Integrated Remedial Design Packages for Individual Remediation Areas | Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material: To be Submitted |
| 000 | Area 1, Phase II Supplemental Characterization Package, April 1999 | Sludge Drying Beds (41): Removal of Sludge: Section 3.3, Material Disposition Sampling Plan, pp. 3-3 to 3-4; Excavation of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4 |
| 090006 | DRAFT Implementation Plan for Area 3A/4A; March 2000 | Storage Pad North of Plant 6 (36): Section 3.3.2, Concrete, Asphalt Pads, Roadways and Floors, p. 3-9; Section 3.4.2, HWMUS and USTS, p. 3-15; Section 3.4.3, General Excavation, pp. 3-15 to 3-17 |
| Schedule for Closure (Closure Guidance Item 3.7) | OU1 FINAL Remedial Action Work Plan, January 1997 | Schedule Summary for Remedial Design/Remedial Action Packages; Closure of Waste Pit 4 (27), Waste Pit 5 (42): Table 2-1, p. 2-16 |

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| | , , , | Schedule for Submitting D&D Packages: Table 6-1, p. 6-7 |
| | OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement | Schedule for Removing & Decontaminating Above-Grade Unit Structures and Equipment: To be Submitted for Each D&D Complex |
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| · | FINAL Implementation Document for HWMUs #28 and #50, December 1998 | Trane Incinerator (28); UNH Tanks – Raffinate Bldg. (50): Letter, J Reising to G. Jablonowski and T. Schneider, "Transmittal of RCRA/CERCLA Integrated Closure Implementation Document for the Trane Incinerator (HWMU No. 28) and UNH Tanks, Hot Raffinate Building (HWMU No. 50)," dated December 22, 1998 |
| | FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999 | Plant 6 Warehouse – Bldg. 79 (37): Figure 4-1, p. 42 |
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| | OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement | Decontamination of Above-Grade Unit Structures and Equipment; To be Submitted for Each D&D Complex |
| | FINAL Plant 1 Complex – Phase I Implementation Plan, March 1996 | Plant 1 Storage Bldg. – Bldg. 67 (25): HWMU Decontamination: Section 3.7, pp. 42 to 45 Materials Management: Table 2-1, p. 12 |
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| | FINAL Implementation Document fo HWMUs #28 and #50, December 1998 | Trane Incinerator (28): HWMU Decontamination |
| 9 | | UNH Tanks – Raffinate Bldg. (50): HWMU Decontamination |
| 000008 | FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999 | Plant 6 Warehouse – Bldg. 79 (37): Section 3.9, p. 37 |
| . w | OU5 FINAL Sitewide Excavation Plan, July 1998 | Decontamination of Excavation Equipment: Section F.2.3, Installation of Decontamination and Wash Facilities |

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| | Area 1, Phase II Integrated Remedial Design Package, September 1998 | Sludge Drying Beds (41): Remediation-Generated Water Management: Section 3.4.4, Remediation-Generated Wastewater Management, pp. 3-33 to 3-35 |
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| | OU5 FINAL Record of Decision, January 1996 | Final Remediation Levels (FRLs) for Soil and Groundwater: Table 9-3, p. 9-23 Table 9-4, p. 9-26 |
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| | OU5 Integrated Remedial Design Packages for Individual Remediation Areas | Area/Phase-Specific FRLs: To be Submitted |
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| 8. Sampling Plan and Analytical Procedures (Closure Guidance Item 3.14) - Includes Sampling to Define the Extent of Contamination and Sampling to Verify the Unit is Clean | OU1 FINAL Remedial Investigation Report, August 1994 | Procedures for Determining Nature and Extent of Contamination at Waste Pit Area: Waste Pit 4 (27), Waste Pit 5 (42): Chapter 2, pp. 2-1 to 2-161 |
| | OU1 FINAL Remedial Action Documents Package, April 1999 | Procedures for Sampling and Analysis of Waste Pit Area; Certification of Waste Pit Area Cleanup: Sampling and Analysis Plan |
| | OU5 FINAL Remedial Investigation Report, March 1995 | Procedures for Determining Nature and Extent of Soil Contamination: Chapter 2, pp. 2-1 to 2-83 |
| | OU5 FINAL Sitewide Excavation Plan, July 1998 | Procedures for Certifying Attainment of Soil Cleanup: Section 2.2.2, p. 2-18 to 2-19; Section 2.2.5, p. 2-22 to 2-23; Section 3.4, p.3-22 to 3-23 Appendix G, Certification Design Rationale |
| | OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation Areas | Area/Phase-Specific Procedures for Certifying FRL Attainment: To be Submitted |

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| | FINAL Certification Design Letter for Area 1, Phase II, October 1999 | Sludge Drying Beds (41): Section 4.1, Certification Design, pp. 4-1 to 4-5; Section 4.3, Sampling, pp. 4-6 to 4-7 |
| Description of Removal Efforts and Treatment Processes (Closure Guidance | OU1 FINAL Remedial Design Documents Package, August 1998 | Removal and Handling of Waste Pit Waste - Waste Pit 4 (27), Waste Pit 5 (42): Volume 2, Excavation Plan |
| Item 3.15) | OU1 FINAL Remedial Action Documents Package, April 1999 | Processing of Waste Pit Waste - Waste Pit 4 (27), Waste Pit 5 (42): Operations and Maintenance (O & M) Plan for Remediation Facilities |
| | OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement | Removal and Treatment of Waste in HWMU: To be Submitted for Each D&D Complex (where applicable) |
| | OU5 FINAL Feasibility Study Report, June 1995 | Evaluation of Technologies and Process Options: Section 3.3, p. 3-5 |
| 000010 | OU5 FINAL Sitewide Excavation Plan, July 1998 | Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F, Implementation of Construction; Appendix I, Sitewide Extent of Contamination by Constituent |
| | OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation Areas | Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material: To be Submitted |
| | Area 1, Phase II Supplemental Characterization Package, April 1999 | Sludge Drying Beds (41): Management of Sludge: Section 3.3, Material Disposition Sampling Plan, p. 3-3; Management of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4 |
| | DRAFT Implementation Plan for Area 3A/4A, March 2000 | Storage Pad North of Plant 6 (36): Section 3.3.2, Concrete, Asphalt Pads, Roadways and Floors, p. 3-9; Section 3.4.2, HWMUs and USTs, p. 3.15; Section 3.4.3, General Excavation, pp. 3-15 to 3-17 |
| 10. Landfill Closure Requirements – (if applicable) ³ - (Closure Guidance Item 3.16) | OU1 FINAL Record of Decision, January 1995 | ARARs: Relevant and Appropriate as some remedial alternatives may require closure to these standards Tables B-28 and B-29 |
| | OU1 FINAL Remedial Design Work Plan, June 1995 | Revised ARARs: Tables A-24 and A-25 |
| - | OU5 FINAL Record of Decision, January 1996 | Not Applicable, if Remediation Levels for Soil and Groundwater are Sufficient for a Clean Hazardous Waste Management Unit Closure ¹ : ARARs: Table B-3, p. B.3-10 |

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| Continued . | Area 1, Phase II Integrated Remedial Design Package, September 1998 | Sludge Drying Beds (41): Included within Appendix A, Design Criteria Package, Table A-2, p. A-32, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal. |
| | DRAFT Implementation Plan for Area 3A/4A; March 2000 | Storage Pad North of Plant 6 (36): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal. |
| 11. Certification (Closure Guidance Item 3.18) | OU1 Remedial Action Report | Certification Sampling Results: To be Submitted |
| | OU3 Project Completion Reports | Summary of HWMU Remediation Activities/Statement of Conformance with Requirements and Performance Standards: To be Submitted for Each D&D Complex |
| | FINAL Plant 1 Complex – Phase 1 Project Completion Report, December 1997 | Plant 1 Storage Bldg Bldg. 67 (25): Section 2.1.3, pp. 7 to 8 |
| | FINAL Thorium/Plant 9 Complex Project Completion Report, April 1999 | Plant 9 Warehouse - Bldg. 81 (35): Section 2.2.11, pp. 12 to 14 |
| | FINAL Project Completion Report for the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999 | Trane Incinerator (28); UNH Tanks – Raffinate Bldg. (50) |
| _ | FINAL Miscellaneous Small Structures Decontamination and Dismantlement | Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 2.3, pp. 3 to 5 |
| 000011 | Project, Task Order #432 Completion Report, October 199 <u>9</u> | KC-2 Warehouse - Bldg. 63 (34) Section 2.4, pp. 5 to 6 |
| | OU5 Certification Reports for Individual Remediation Areas | Area/Phase-Specific Certification Reports: To be Submitted |
| | OU5 Remedial Action Report | Summary of Remedial Activities and Statement of Conformance with Requirements and Standards: To be Submitted |
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| 12. Status of Facility (or Unit) After Closure | OU1 FINAL Record of Decision, January | Status of Waste Pits After OU1 Remedial Action: |
| (Closure Guidance Item 3.19) | 1995 | pp. 10-1 to 10-9 |
| | OU3 FINAL Record of Decision for Interim Remedial Action, June 1994 | Status of Production Area HWMUs After OU3 Remedial Action: Section 5.4, p. 11 |

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| 12. Status of Facility (or Unit) After Closure (Closure Guidance Item 3.19) - Continued | OU3 Final Record of Decision for Final Remedial Action, September 1996 | Integration of the Interim and Final Remedial Actions, Section 2.1, p. 9 |
| | OU5 FINAL Record of Decision, January 1996 | Status of FEMP After Soil and Groundwater Remediation: Section 4.0, p. 4-1 |
| | OU5 FINAL Sitewide Excavation Plan, July 1998 | Certification Reports: Section 7.4, pp. 7-10 to 7-14 |
| | OU5 Certification Reports for Individual Remediation Areas | Status of those HWMUs That Had Soil Contamination After Soil Remedial Action: To be Submitted |

¹ Closure Guidance Items are from the Closure Plan Review Guidance for RCRA Facilities, Ohio EPA, March 1999.

² The perched water contamination has many sources, only some of which are the HWMUs. Because of this, it is difficult or impossible to identify the degree to which a HWMU may have contributed to perched water contamination. Therefore, the nature and extent of contamination in the perched water, and the most appropriate remedial action method and objectives, are best achieved under the CERCLA process alone.

³ Ohio EPA has two options for clean closure where there are no more RCRA requirements (i.e., no post-closure requirements) for the existing HWMUs: (1) complete removal of waste and impacted environmental media, and (2) complete removal of waste and impacted environmental media to health-based standards (known at the FEMP as Final Remediation Levels, FRLs). Post closure requirements will, however, be applicable to the CERCLA on-property disposal cell as it will take some soil and debris contaminated with RCRA-hazardous waste [see Post Closure Care and Inspection Plan, On-Site Disposal Facility (20100-PL-010, Rev. 1, July 1997)].